

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ
RICHARD F. ALBERT
ROBERT J. ANELLO*
KATHLEEN E. CASSIDY
BENJAMIN S. FISCHER
CATHERINE M. FOTI
CHRISTOPHER B. HARWOOD
LAWRENCE IASON
BRIAN A. JACOBS
TELEMACHUS P. KASULIS
KAREN R. KING
THOMAS A. MCKAY
ROBERT M. RADICK*
JONATHAN S. SACK**
EDWARD M. SPIRO
JEREMY H. TEMKIN
RICHARD D. WEINBERG

565 FIFTH AVENUE
NEW YORK, NEW YORK 10017
(212) 856-9600
FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION

espiro@maglaw.com
(212) 880-9460

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SENIOR COUNSEL
PAUL R. GRAND

COUNSEL
JASMINE JUTEAU

ROBERT G. MORVILLO
1938-2011

MICHAEL C. SILBERBERG
1940-2002

JOHN J. TIGUE, JR.
1939-2009

*ALSO ADMITTED IN WASHINGTON, D.C.
**ALSO ADMITTED IN CONNECTICUT

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, No. 03-md-01570 (GBD) (SN)

Dear Judge Netburn:

I, together with Kirsch & Niehaus PLLC, represent Kreindler & Kreindler LLP (the "Firm") in connection with the pending application of the Kingdom of Saudi Arabia ("Saudi Arabia") for attorneys' fees and expenses, dated October 12, 2022 (the "Application"). *See* ECF No. 8623. I write jointly with counsel for Saudi Arabia to inform the Court that the Firm and Saudi Arabia have reached an agreement in principle to resolve the Application and therefore respectfully request that the Court defer rendering a decision on the pending Application while the Firm and Saudi Arabia finalize an agreement.

The agreement in principle addresses the fees and expenses sought by Saudi Arabia in the Application, as well as Saudi Arabia's fees and expenses in connection with the Firm's stay request and objections before Judge Daniels. *See* ECF Nos. 8607, 8681 & 8700. The agreement is without prejudice to and reserves all rights of: (i) the Firm with respect to review of this Court's sanctions orders before the U.S. Court of Appeals for the Second Circuit; and (ii) Saudi Arabia to apply for additional attorneys' fees and expenses in connection with such review before the Second Circuit.

Accordingly, the Firm and Saudi Arabia respectfully request that the Court defer rendering a decision on the pending Application while they finalize an agreement, which they

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undertake to do expeditiously. Upon execution of the agreement, Saudi Arabia will withdraw its Application.

Respectfully submitted,

/s/ Edward M. Spiro
Edward M. Spiro
Counsel for Kreindler & Kreindler LLP

Cc: The Honorable George B. Daniels (via ECF)
Counsel for the Kingdom of Saudi Arabia (via ECF)
All Other MDL Counsel of Record (via ECF)